

EXHIBIT B

STATE OF SOUTH DAKOTA) IN CIRCUIT COURT
: SS
COUNTY OF CODINGTON) THIRD JUDICIAL CIRCUIT

CHARLES W. HAAN, Constituent

Plaintiff,

vs.

KRISTI NOEM, US Congressperson

Defendant

CIV. FILE 13-126

COMPLAINT

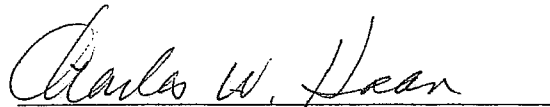
COMES NOW, the Plaintiff, Charles W. Haan, and complains and alleges as follows:

1. In 2010, the Defendant campaigned for election to the US House of Representatives making various promises and commitments.
2. In November, 2010, the Defendant was elected to the US House of Representatives.
3. In January 2011, the Defendant took an Oath, "I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign, and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and truthfully discharge the duties of the office on which I am about to enter: So help me God."
4. The Defendant has breached the Oath, the contract, in failing to use the authority vested in the Defendant to consistently, vigorously, aggressively, and diligently propose, write, and introduce Legislation:

- a. to end the Federal funding of Planned Parenthood;
 - b. to end the Federal funding of embryonic stem cell research;
 - c. to stop the killing of the unborn;
 - d. to stop the implementation of the Patient Protection and the Affordable Care Act;
 - and
 - e. to stop the unconstitutional redistribution of incomes in various forms, i.e. granting money to religious organizations, continuing the food stamp program, etc.
5. The Defendant has broken her promises, contract, in voting for certain Legislation:
- a. continuing resolutions;
 - b. to raise taxes; and
 - c. to raise the debt ceiling.
6. The Plaintiff reserves the right to raise other failures of the Defendant that are not delineated above.

THEREFORE, the Plaintiff seeks redress of the grievances listed herein as per the First Amendment to the US Constitution that the Defendant should be Ordered to resign, or, to be removed from Office as a US Congressperson.

Dated at Watertown, South Dakota on the 22nd day of January, 2013.



Charles W. Haan
The Plaintiff herein
217 17 Street SE
Watertown, South Dakota 57201
(605) 882-3657

CERTIFICATE of SERVICE

I, Charles W. Haan, the Plaintiff herein, hereby certify that on the 22nd day of January, 2013, a true and correct copy of the foregoing **COMPLAINT** was mailed to:

Congresswoman Kristi Noem
State of South Dakota, at large
505 12th Street SE
Watertown, South Dakota 57201

by US CERTIFIED MAIL, 7010 0780 0001 8708 5086 postage prepaid thereon.

Dated at Watertown, South Dakota, this 22nd day of January, 2013.

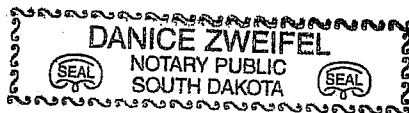
Charles W. Haan

Charles W. Haan
The Plaintiff herein
217 17th Street SE
Watertown, South Dakota 57201

STATE OF SOUTH DAKOTA)
SS
COUNTY OF CODINGTON)

On the 22 day of January, 2013, Charles W. Haan, the Plaintiff herein, did appear, in person before me, Danice Zweifel, Notary Public, State of South Dakota, to place his signature on the above **COMPLAINT** and **CERTIFICATE of SERVICE**.

Seal:



Danice Zweifel

Notary Public: State of South Dakota
My Commission expires:
6-11-13

(3 of 3)

FILED

MAR 04 2013

SOUTH DAKOTA UNIFIED JUDICIAL SYSTEM
3RD CIRCUIT CLERK OF COURT

By BC